



Trinity Centre  
111 Broadway, Suite 1403  
New York, New York 10006  
Telephone: (212) 943-9080  
Fax: (212) 943-9082  
www.vandallp.com

**Lloyd R. Ambinder**  
Direct dial: (212) 943-9081  
lambinder@vandallp.com

August 25, 2011

**VIA ECF**

Magistrate Judge Roanne L. Mann  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Lujan et al. v. Cabana Mgmt., Inc. et al.*, 10-cv-00755 (ILG) (RLM)

Dear Judge Mann:

This firm is legal counsel to Plaintiff and a collective class in the above-referenced wage and hour action. I am pleased to advise Your Honor that, after many hours of intense negotiations yesterday, the parties have reached a settlement in principle. The details of the settlement have not been worked out. However, we are all working in good faith to finalize an agreement.

At this time the parties respectfully request that all motions be stayed for a period of fourteen days (14) days. Mr. Weiner is starting a one week vacation tomorrow, and the parties would like some time to reconcile certain critical elements of the proposed settlement. Therefore, we would like to avoid engaging in potentially unnecessary motion practice during this short period of time.

Respectfully submitted,

\_\_\_\_\_/s/\_\_\_\_\_  
Lloyd R. Ambinder

cc: Douglas Weiner, Esq. (via ECF)

*Application granted. The parties shall file a status report by September 9, 2011.*

**SO ORDERED**

/s/

**Roanne L. Mann**  
**U.S. Magistrate Judge**

**Dated:**

*8/25/11*